



August 1, 2002

Utah Coal Program
Utah Division of Oil, Gas, and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

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DIVISION OF
OIL, GAS AND MINING

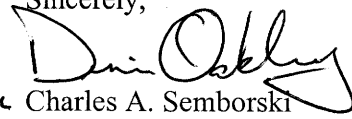
Re: Response to Deficiencies to the Midterm Review, PacifiCorp, Cottonwood/Wilberg Mine, C/015/019-MT02, Emery County, Utah.

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits responses to the deficiencies received from the Division on their technical midterm review of the Cottonwood/Wilberg Mine.

The attached document attempts to answer the deficiency received on October 12, 2001. The Division's findings will be first listed by regulation and explanation. PacifiCorp will follow by a response in *italics*.

If you have any questions or concerns regarding this document, please contact myself at (435) 687-4720 or Dennis Oakley at (435) 687-4825.

Sincerely,


for Charles A. Semborski
Geology/Permitting Supervisor

Encl

Cc: Carl Pollastro
File

J:\Environmental\PERMITS\CottonwoodMine\AMENDMNT\2002\Midterm Review\defrespJuly2002.wpd

Huntington Office:
(435) 687-9821
Fax (435) 687-2695
Purchasing Fax (435) 687-9092

Deer Creek Mine:
(435) 687-2317
Fax (435) 687-2285

Trail Mountain Mine:
(435) 748-2140
Fax (435) 748-5125

The following responses to deficiencies are formatted as found in the technical analysis document. They are broken down into logical section headings similar to the R645 regulations. In each section, the regulation number along with the associated deficiency is followed by the permittee's italicized response.

R645-301-112, Volume one of the MRP needs to include the current ownership and control information.

PacifiCorp has been actively working on a new officer and director list for the Cottonwood/Wilberg Mine since the new OSM regulations have been incorporated into the Code of Federal Regulations. Enclosed are the corporate structures of Scottish Power and the officer and director lists pertaining to Energy West Mining Company. These lists will be placed in Volume 1, Part 1, Appendix B when amendment AM00A is approved. Amendment AM00A amends the said legal and financial section of the Cottonwood/Wilberg permit. The Officer and Director lists for the PacifiCorp structure are included for your inspection.

R645-301-121.200, -512.100, -512.200, Location and use of silt fence at the Guard Station needs to be clarified on maps or plans.

The blue line surrounding each individual ASCA area does not represent a silt fence on Map 3-16. It only represents the associated area which each ASCA treats. However, it is evident how the Division could misinterpret the layout of the ASCA.

Map 3-16 in Volume 6 illustrates each ASCA within the Cottonwood/Wilberg Mine complex. In order to make the illustrations more clear, the hatch used to delineate the ASCA area has been modified and noted in the legend. Silt fence locations have also been modified to more clearly illustrate their location.

R645-301-121.200, -512.100, -512.200, Map 3-16 needs to be checked against what is on the ground to confirm whether or not the Conveyor Bent Pad ASCA is where indicated on the map.

The small 0.04 acre Bent Pad ASCA is as illustrated on Map 3-16. The topography of the area is such that runoff naturally drains toward the undisturbed drainage. The undisturbed drainage is collected in a 30" culvert and transferred through the mine disturbed area without mixing with disturbed runoff. The culvert inlet is treated using straw bales.

The Division should note that only a small portion of surface runoff within this ASCA gets collected in the 30" culvert. Most of the runoff flows toward the crane pad which is then treated by the sediment pond.

R645-301-121.200, -512.100, -512.200, Maps in Volume 10, such as 4-1, 4-2, or 4-5, need to show the ASCA and the location of silt fence at Waste Rock Site - 65027 accurately enough to allow comparison of design to actual construction or installation, and inspection.

The boundary of the New Waste Rock Site has been an issue for quite some time . Energy West submitted the latest permit boundary maps in January, 2002. A small error in the description was found and the maps were returned. The error has been eliminated and the following maps will be resubmitted;

- 4-1 (CM-10826-WB) - 7 Copies
- 4-2 (CM-10821-WB) - 3 Copies
- 4-3 (CM-10822-WB) - 7 Copies
- 4-4 (CM-10816-WB) - 7 Copies
- 4-5 (CM-10823-WB) - 7 Copies
- 4-6 (CM-10824-WB) - 7 Copies
- 4-7 (CM-10825-WB) - 7 Copies
- 4-8 (CM-10810-WB) - 3 Copies 1 of 6 through 6 of 6
- 4-9 (CM-10820-WB) - 3 Copies
- 4-10 (CM-10811-WB) - 3 Copies 1 of 2 through 2 of 2
- 4-11A (CM-10815-WB) - 3 Copies
- 4-11B (CM-10846-WB) - 3 Copies
- 4-12 (CM-10830-WB) - 3 Copies
- 4-13 (CM-10837-WB) - 3 Copies 1 of 2 through 2 of 2
- 4-14 (CM-10877-WB) - 7 Copies
- 7-1 (CM-10818-WB) - 7 Copies
- 7-2 (CM-10831-WB) - 7 Copies
- 9-1 (CM-10819-WB) - 3 Copies

Stamp these maps approved and insert into MRP. Please refer to the C1/C2 forms for there insertion location.

R645-301-121.200, -512.100, -512.200, The ASCA and associated BTCA at the Sewer Absorption Field need to be shown on a map or plan at a scale large enough to allow comparison of design to actual construction or installation, and inspection.

Map 7704-PP10 in Volume 6 has been revised to more clearly illustrate the ASCA area within the Sewer Absorption Field. This map is at a readable scale of 1:100. The C1/C2 forms are included.

APPLICATION FOR PERMIT PROCESSING

Permit Change ☒New Permit ☐Renewal ☒Transfer ☐Exploration ☐Bond Release ☐

Permit Number: C/015/019

Title of Proposal: Response to Deficiencies to the Midterm Review, PacifiCorp,
Cottonwood/Wilberg Mine, C/015/019-MT02, Emery County, Utah

Mine: Cottonwood/Wilberg Mine

Permittee: PacifiCorp

Description, include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first 8 questions (gray), this may be a Significant Revision and require Public Notice. Any questions, please call a Permit Supervisor.

- | | | |
|---|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO # _____ |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 4. Does application include operations in hydrologic basins other than as currently approved? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Does application result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 6. Does the application require or include public notice/publication? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 7. Does the application require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV # _____ |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____ |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 11. Does the application affect the surface landowner or change the post mining land use? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?) |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 15. Does application require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 16. Does the application require or include vegetation monitoring, removal or revegetation activities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 17. Does the application require or include construction, modification, or removal of surface facilities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 19. Does the application require or include certified designs, maps, or calculations? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided for? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 23. Does the application affect permits issued by other agencies or permits issued to other entities? |

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, hereby.

Signed - Name - Position - Date
Charles A. Semborski Geology/Permitting Supervisor
August 12, 2002

Subscribed and sworn to before me this 12 day of August, 2002.

My Commission Expires: 12/22, 2005
 Attest: STATE OF UTAH
Emery COUNTY OF



LORI ANN ANDERSON
 NOTARY PUBLIC • STATE of UTAH
 31 NORTH MAIN
 HUNTINGTON, UT 84528
 COMM. EXP. 12-22-2005

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DIVISION OF
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ASSIGNED TRACKING NUMBER

Application for Permit Processing

Detailed Schedule of Changes to the MRP

Title of Application: Response to Deficiencies to the Midterm Review, PacifiCorp,

Cottonwood/Wilberg Mine, C/015/019-MT02, Emery County, Utah

Permit Number: C/015/019

Mine: COTTONWOOD/WILBERG

Permittee: PACIFICORP

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

	DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 3, Table of Contents (Entire Section)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 6, Map 3-16, WS449D, Cottonwood Mine Surface Yard Map (7 copies)
<input type="checkbox"/> ADD <input type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Review Officer and Director List for Energy West Mining (to be included as part of AM00A)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 4-1, CM-10826-WB, Waste Rock Storage Facility (7 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 4-2, CM-10821-WB, Waste Rock Storage Facility (3 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 4-3, CM-10822-WB, Waste Rock Storage Facility (7 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 4-4, CM-10816-WB, Waste Rock Storage Facility (7 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 4-5, CM-10823-WB, Waste Rock Storage Facility (7 clean copies)
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<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 4-11A, CM-10815-WB, Waste Rock Storage Facility (3 clean copies)
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<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 7-1, CM-10818-WB, Waste Rock Storage Facility (7 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 7-2, CM-10831-WB, Waste Rock Storage Facility (7 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 10, Map 9-1, CM-10819-WB, Waste Rock Storage Facility (3 clean copies)
<input type="checkbox"/> ADD <input checked="" type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	Volume 6, Map 7704-PP10, Main Absorption Field (4 copies)
<input type="checkbox"/> ADD <input type="checkbox"/> REPLACE <input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

When Officer and Director list is reviewed and conditionally approved by the Division, seven clean copies will be submitted as part of amendment AM00A to replace the current outdated Officer and Director list.

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